

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,
Inc., Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendants.

NO. 2:21-CV-00022-Z

DECLARATION OF VICKIE JANE BARROW-KLEIN

I, VICKIE JANE BARROW-KLEIN, declare and state as follows:

1. I am currently employed by Planned Parenthood Federation of America, Inc. (“PPFA”) as the Chief Financial Officer and Chief Operating Officer. I have served as Chief Financial Officer since March 2018 and as Chief Operating Officer since January 2022. Prior to that, I spent more than 20 years in the international development non-profit sector with experience working in complex federated organizations at a global scale.

2. I am over the age of 18 and have personal knowledge of the matters herein or have acquired such knowledge by personally examining the business records kept in the normal course of business by PPFA. If called upon to testify, I could and would testify to the facts in this declaration.

3. I make this declaration in support of Planned Parenthood Federation of America, Inc.'s Opposition to Relator's Motion to Compel in the above-captioned case. I am familiar with the claims and allegations in the case based on my review of the Complaint filed by Relator and the Complaint in Intervention filed by the State of Texas.

4. PPFA does not maintain a central repository of current and historical organizational charts, and an ad-hoc search of electronically stored information ("ESI") for organizational charts covering a 7-year time period would be very burdensome. Organizational charts are created on an ad-hoc basis by employees in many different departments and groups at PPFA. To search for potentially responsive organizational charts, PPFA would therefore need to collect and search dozens of custodians' files. For example, between 2015 and 2022, PPFA has had between 13 and 20 employees in the human-resources department each year. As such, PPFA would need to collect and search at least 20 custodians' files just to determine how these charts were created and managed in a single department.

5. A keyword-based ESI collection and review is also unlikely to be reliable, given that organizational-chart documents are not always specifically identified as such when they are attached to email communications.

6. PPFA does not maintain policies or procedures regarding the prevention, detection, or reporting of healthcare fraud and abuse by PPFA, because PPFA does not provide healthcare services or receive Medicaid reimbursements.

7. PPFA does not provide training regarding the prevention, detection, or reporting of healthcare fraud and abuse, because PPFA does not provide healthcare services or receive Medicaid reimbursements.

8. PPFA does not have a Health Care Compliance Program or Health Care Compliance Officer.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on September 13, 2022 in Mechanicsville, Maryland.


Vickie Jane Barrow-Klein